

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

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| In re MINING PROJECT WIND DOWN HOLDINGS, INC. (f/k/a Compute North Holdings, Inc.), <i>et al.</i>,¹ <p style="text-align: center;">Debtors.</p> | § § § § § § § § § | Chapter 11 Case No. 22-90273-MI (Jointly Administered) |
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**FIRST INTERIM FEE APPLICATION OF FERGUSON BRASWELL FRASER
KUBASTA PC, EFFICIENCY COUNSEL TO DEBTORS AND
DEBTORS IN POSSESSION FOR THE PERIOD FROM
DECEMBER 7, 2022 THROUGH DECEMBER 31, 2022**

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| Name of Applicant: | <u>Ferguson Braswell Fraser Kubasta PC</u> | |
| Applicant's Role in Case: | Efficiency Counsel to Debtors and Debtors in Possession | |
| Date and Docket No. of Employment Order(s): | Docket No. 852 signed on January 23, 2023 (effective as of December 7, 2022) | |
| Interim Application (X) No. _____ 1st _____ Final Application () | Indicate whether this is an interim or final Application. If interim, indicate the number (1 st , 2 nd , 3 rd , etc.) | |
| | Beginning Date | End Date |
| Time period covered by this Application for which interim compensation has not previously been awarded: | 12/07/2022 | 12/31/2022 |
| Were the services provided necessary to the administration of or beneficial at the time | | |

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, include: Mining Project Wind Down Holdings Inc. (f/k/a Compute North Holdings, Inc.) (4534); Mining Project Wind Down LLC (f/k/a Compute North LLC) (7185); Mining Project Wind Down Corpus Christi LLC (f/k/a CN Corpus Christi LLC) (5551); Mining Project Wind Down Atoka LLC (f/k/a CN Atoka LLC) (4384); Mining Project Wind Down BS LLC (f/k/a CN Big Spring LLC) (4397); Mining Project Wind Down Colorado Bend LLC (f/k/a CN Colorado Bend LLC) (4610); Mining Project Wind Down Developments LLC (f/k/a CN Developments LLC) (2570); Mining Project Wind Down Equipment LLC (f/k/a CN Equipment LLC) (6885); Mining Project Wind Down King Mountain LLC (f/k/a CN King Mountain LLC) (7190); Mining Project Wind Down MDN LLC (f/k/a CN Minden LLC) (3722); Mining Project Wind Down Mining LLC (f/k/a CN Mining LLC) (5223); Mining Project Wind Down Pledgor LLC (f/k/a CN Pledgor LLC) (9871); Mining Project Wind Down Member LLC (f/k/a Compute North Member LLC) (8639); Mining Project Wind Down NC08 LLC (f/k/a Compute North NC08 LLC) (8069); Mining Project Wind Down NY09 LLC (f/k/a Compute North NY09 LLC) (5453); Mining Project Wind Down STHDAK LLC (f/k/a Compute North SD, LLC) (1501); Mining Project Wind Down Texas LLC (f/k/a Compute North Texas LLC) (1883); Mining Project Wind Down TX06 LLC (f/k/a Compute North TX06 LLC) (5921); and Mining Project Wind Down TX10 LLC (f/k/a Compute North TX10 LLC) (4238). The Debtors' service address for the purposes of these chapter 11 cases is 300 North LaSalle, Suite 1420, Chicago, Illinois 60654.

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| rendered toward the completion of the case? (Yes) | |
| Were the services performed in a reasonable amount of time commensurate with the complexity, importance and nature of the issues addressed? (Yes) | |
| Is the requested compensation reasonable based on the customary compensation charged by comparably skilled practitioners in other non-bankruptcy cases? (Yes) | |
| Do expense reimbursements represent actual and necessary expenses incurred? (N/A) | |
| Compensation Breakdown for Time Period Covered by this Application | |
| Total fees requested in this Application: | \$2,150.00 |
| Total expense reimbursements requested in this Application: | \$0.00 |
| Total fees and expenses requested in this Application: | \$2,150.00 |
| Total fees awarded in all prior Applications: | N/A |
| Total expenses awarded in all prior Applications | N/A |
| <p>Plan Status: On December 21, 2022, the Court entered an order [Docket No. 715] conditionally approving the adequacy of the disclosure statement (the “Disclosure Statement”) for the <i>Second Amended Joint Liquidating Chapter 11 Plan of Compute North Holdings, Inc. and its Debtor Affiliates</i>. On January 31, 2023, the Debtors filed their <i>Third Amended Joint Liquidating Chapter 11 Plan of Mining Project Wind Down Holdings, Inc. (f/k/a Compute North Holdings, Inc.) and its Debtor Affiliates</i> [Docket No. 889] (as the same may be amended, revised or supplemented from time to time, the “Plan”). The voting deadline for the Plan was February 1, 2023 at 4:00 p.m. (CST). A combined hearing to consider approval of the Disclosure Statement on a final basis and confirmation of the Plan is scheduled for February 16, 2023 at 1:30 p.m. (CST).</p> | |
| <p>Primary Benefits: Ferguson Braswell Fraser Kubasta PC (“FBFK”) provided services related to claims analysis and claims objections on behalf of the Debtors during the Application Period at a lower rate than Debtors’ lead bankruptcy counsel. This work included communicating with the Debtors’ other professionals and getting up to speed on case matters and the claims resolution process. FBFK also provided services related to its retention and employment in these bankruptcy cases.</p> | |

Pursuant to sections 330 and 331 of Title 11 of the United States Code, Rule 2016 of the Federal Rules of Bankruptcy Procedure, Rule 2016-1 of the Bankruptcy Local Rules of the United States Bankruptcy Court for the Southern District of Texas, the Procedures for Complex Cases in the Southern District of Texas, and the Court’s *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals* [Docket No. 249], Ferguson Braswell Fraser Kubasta PC (“**FBFK**”), efficiency counsel to the debtors and debtors in possession (collectively, the “**Debtors**”) in the above-captioned chapter 11 cases, FBFK FIRST INTERIM FEE APPLICATION

hereby requests interim allowance and payment for professional services rendered during the Application Period in the amount of \$2,150.00 and reimbursement of actual and necessary expenses incurred during the Fee Period in the amount of \$0.00, for a total of \$2,150.00. In support of its request, FBFK submits the following attached Exhibits:

- Exhibit A contains the monthly statements for the Fee Period; and
- Exhibit B contains the Proposed Order.

RESERVATION OF RIGHTS

To the extent that time or expenses for services rendered or expenses incurred relate to the Fee Period, but were not processed before the preparation of this Application, or FBFK has for any reason not sought compensation or reimbursement with respect to such services or expenses, FBFK reserves the right to request additional compensation for such services, and reimbursement of such expenses, in a supplemental or future application. Additionally, FBFK does not waive, and expressly reserves, its right to respond to any objections regarding this Application and the amounts sought for FBFK's work in these chapter 11 cases.

Respectfully submitted: February 14, 2023

**FERGUSON BRASWELL
FRASER KUBASTA PC**

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**EFFICIENCY COUNSEL
FOR DEBTORS**